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Spencer, Captain Dori Koren, Officer Evan Spoon and Officer Jordan Turner

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LANCE DOWNES-COVINGTON, an
individual, SOLDADERA SANCHEZ, an
individual, ROBERT O'BRIEN, an
individual, EMILY DRISCOLL, an
individual, ALISON KENADY, an
individual, TENISHA MARTIN, an
individual, GABRIELA MOLINA, an
individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
LIEUTENANT KURT MCKENZIE, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER TABATHA DICKSON, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN PATRICIA SPENCER, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN DORI KOREN, as an individual
and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
EVAN SPOON, as an individual and in his
capacity as a Las Vegas Metropolitan Police
Department Officer; JORDAN TURNER, as
an individual and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; UNKNOWN OFFICERS 1-14, as
individuals and in their capacity as Las Vegas
Metropolitan Police Department Officers,

Defendants.

Case Number:
2:20-cv-01790-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(FIRST REQUEST)

STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**(FIRST REQUEST)**

Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through their attorneys of record, Margaret A. McLetchie, Esq., Leo S. Wolpert, Esq. and Lisa A. Rasmussen, Esq., with the law firm of McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq. and Andrew Yates, Esq., with the law firm of Marquis Aurbach, hereby agree and jointly stipulate the following.

1. This request for an extension of time is not sought for an improper purpose or other purpose of delay. The parties are requesting a 80-day extension at this time.

2. The dispositive motion deadline in this case is currently August 4, 2025. ECF No. 202 at 26.

3. For cost-saving and efficiency purposes, the parties agree that the dispositive motion deadline in this case should be extended to be close in time to, or clustered with, the dispositive motion deadlines in two cases involving distinct facts and circumstances but similar policy issues. These two cases are *Wright-Rogers v. LVMPD, et al.*, Case No. 2:22-cv-00867-CDS-BNW and *Solomon v. LVMPD, et al.*, Case No. 2:22-cv-00847-JCM-DJA.

4. While *Wright-Rogers*, *Solomon*, and this case differ factually in some respects relevant to each plaintiff, the cases each stem from the widespread protests following George Floyd's death in 2020 and the police response to those protests.

5. Many of the overarching policy, practice, and custom issues related to these three cases are similar, and as such the *Monell* arguments in each case will likely substantially overlap.

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1 6. Clustering the dispositive motion deadline here with those in *Wright-Rogers*
2 and *Solomon* will simplify the issues and streamline the judicial process for the Parties by
3 permitting the Parties to draft dispositive motions in each case simultaneously.

4 7. Clustering the dispositive motion deadline here with those in *Wright-Rogers*
5 and *Solomon* will reduce the burden on and promote judicial efficiency in the courts, and this
6 Court in particular, through allowing the Parties to present similar issues to the Court around
7 the same time.

8 8. The current dispositive motion deadline in *Wright-Rogers v. LVMPD, et al.* is
9 October 20, 2025.

10 9. The current dispositive motion deadline in *Solomon v. LVMPD, et al.* is also
11 October 20, 2025.

12 10. The Parties understand that there are outstanding discovery issues in these
13 related matters and that these dates are subject to change. The Parties will promptly update
14 the Court and, if necessary, provide an updated stipulation for the Court's consideration if
15 there are any changes to the above dates.

16 11. This is the first request for extension of time to file dispositive motions in this
17 matter. The Parties respectfully submit that the reasons set forth above constitute compelling
18 reasons for the modest extension.

19 12. The Parties further agree, the dispositive motion deadline currently set for
20 August 4, 2025, shall be extended to Friday, October 17, 2025.

21 13. WHEREFORE, the parties respectfully request that the Dispositive Motion be
22 extended to and including Friday, October 17, 2025.

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1 14. The instant stipulation is being made in good faith and not for purposes of
2 delay and that no party waives any arguments by entering into this stipulation.

3 IT IS SO STIPULATED.

4 Dated this 29th day of July, 2025.

Dated this 29th day of July, 2025.

5 MCLETCHIE LAW

MARQUIS AURBACH

6
7 By: /s/ Margaret A. McLetchie
Margaret A. McLetchie, Esq.
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Lieutenant Kurt McKenzie, Officer
Tabatha Dickson, Captain Patricia
Spencer, Captain Dori Koren, Officer
Evan Spoon and Officer Jordan Turner

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14
15 **ORDER**

16 The above Stipulation is hereby GRANTED.

17 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

20 DATED: 7/31/2025
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 29th day of July, 2025.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach

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